

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT W. SHEPHERD, III,  
a/k/a "Manny" a/k/a "Jig,"

Defendant.

Criminal Action No. 07-84

**FELONY INFORMATION**

The United States Attorney for the District of Delaware charges that:

**COUNT I**

On or about October 30, 2006, in the Eastern District of Pennsylvania, ROBERT W. SHEPHERD, III, a/k/a "Manny, a/k/a "Jig," defendant herein, did knowingly attempt to possess with intent to distribute, more than five hundred grams of a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

All in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

**COUNT II**

From on or about January 19, 2006 to on or about January 23, 2006, in the Central District of California, ROBERT W. SHEPHERD, III, a/k/a "Manny, a/k/a "Jig," defendant herein, did knowingly engage and attempt to engage in a monetary transaction by, through and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, to wit, the transfer of \$18,000 in monetary instruments to a car dealership for the purpose of leasing a 2005 Mercedes Maybach VIN # WDBVG78J15A001102,



which monetary instruments were derived from a specified unlawful activity, to wit, the distribution of cocaine in violation of 21 U.S.C. § 841(a)(1).

All in violation of 18 U.S.C. §§ 1957 and 2.

### **NOTICE OF FORFEITURE**

Upon conviction of the controlled substance offense alleged in Count I of this Information, ROBERT W. SHEPHERD, III, a/k/a/ "Manny" a/k/a "Jig," defendant herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations,

Upon conviction of the illegal monetary transaction offense alleged in Count II of this Information, ROBERT W. SHEPHERD, III, a/k/a/ "Manny" a/k/a "Jig," defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1):

a. All right, title, and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956, for which the defendant is convicted, and all property traceable to such property, including the following: 1) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of Section 1956; 2) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and 3) all property used in any manner or part to commit or to facilitate the commission of those violations.

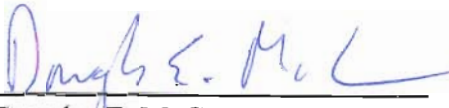
b. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted.

If any of the above-described forfeitable property, as a result of any act or omission of the

- (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value; or
  - (e) has been commingled with other property which cannot be divided without difficulty;
- it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

COLM F. CONNOLLY  
United States Attorney

BY:

  
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Douglas E. McCann  
Assistant United States Attorney

Dated: June 19, 2007